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10 GODIE VIRTUDAZO

11 UNITED STATES BANKRUPTCY COURT  
12 EASTERN DISTRICT COURT OF CALIFORNIA

13 In re:

14 GODIE VIRTUDAZO

15 Debtor.

16 ) Case No.: 10-40072  
17 ) Chapter 7  
18 ) DCN: BLG - 001  
19 )  
20 ) MOTION FOR ORDER COMPELLING  
21 ) TRUSTEE TO ABANDON DEBTOR'S  
22 ) BUSINESS AS ASSET OF ESTATE [11  
23 ) USCS §§ 554(b), 721 ]  
24 )  
25 ) Date: September 7, 2010  
26 ) Time: 9:00 a.m.  
27 ) Courtroom: 28, 7th Floor  
Honorable Michael S. McManus

19 **MOTION FOR ORDER COMPELLING TRUSTEE TO ABANDON DEBTOR'S  
20 BUSINESS AS AN ASSET OF THE ESTATE**

21 Debtor GODIE VIRTUDAZO, by and through the attorney of record Berkeley Collins, will  
22 and hereby does bring a Motion to Compel Trustee to Abandon The Estate's Interest in Debtor's  
23 Business ("Motion") pursuant to 11 U.S.C.S. §§554(b) and 721 of the Bankruptcy Code and Federal  
24 Rule of Bankruptcy Procedure 6007(b).

25 By this motion Debtor requests that the Court enter an order compelling the Chapter 7  
26 Trustee to abandon the bankruptcy estate's interest in Debtor's business on the following grounds:  
27

1. Debtor's business does not possess or own any assets that might be liquidated for value to benefit creditors and is therefore of inconsequential benefit to the estate, and;
  2. The retention and operation of the business by the Trustee would be burdensome and costly to the estate and the creditors thereof.

Said grounds will be supported by this notice of motion, by the motion filed herewith, by the pleadings and papers on file in this bankruptcy case, memorandum of points and authorities herein, declaration in support of this motion and exhibits, if any, filed herewith, and by such oral and documentary evidence as the Court may permit upon the hearing of this motion.

## BANKRUPTCY LAW GROUP, P.C.

Dated: 8/05/10

By: /s/ Berkeley Collins  
Berkeley Collins, Esq.  
Attorney for Debtor